

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

IN RE: Amended Application of Sandhill Connexions,)	
LLC For Designation as an Eligible Telecommunications)	
Carrier in Certain Census Blocks in Chesterfield)	Docket No. 2021-17-C
County for Purposes of Receiving Federal Rural)	
Digital Opportunity Fund ("RDOF") Support)	
)	
Request for Waiver of S.C. Code Ann. Regs. 103-690.1.B)	
and 103-690.C(b))	
_____)	

MOTION FOR ADMISSION PRO HAC VICE

Sandhill Connexions, LLC ("Sandhill") respectfully moves the Public Service Commission of South Carolina ("Commission") to permit Robin E. Tuttle to practice *pro hac vice* before the Commission in the above-referenced matters. Pursuant to Rule 404 of the South Carolina Appellate Court Rules. Ms. Tuttle, together with the undersigned counsel of record, have filed an application for admission *pro hac vice* with the Supreme Court of South Carolina. Exhibit A to this Motion is a file-stamped copy of that application, indicating that the application and the \$250 filing fee have been filed with the Supreme Court. Also attached is a Certificate of Service to the docket service list.

Respectfully submitted this 8th day of March 2021.



Carrie L. DeVier
Herman & Whiteaker, LLC
1109 Trade Street
West Columbia, SC 29169
Telephone: 202-827-0665
Email: cdevier@hermanwhiteaker.com

Attorneys for Sandhill Connexions, LLC

EXHIBIT A

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*
IN THE STATE OF SOUTH CAROLINA**

Application of Sandhill Connexions, LLC
for Designation as an Eligible
Telecommunications Carrier in Certain
Census Blocks in Chesterfield County for
Purposes of Receiving Federal Rural
Digital Opportunity Fund ("RDOF")
Support, and a Request for Waiver of S.C.
Code Ann. Regs. 103-690.1 (B and C)

Docket No. 2021-17-C

South Carolina Public Service
Commission

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: 101 Executive Center Drive, Suite 101,
Columbia, SC 29210-8411

Defendant

Comes now Robin E. Tuttle, applicant herein, and respectfully represents the following:

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FEB - 8 2021

S.C. SUPREME COURT

1. Applicant resides at:

5021 Lady Fern Circle

Street Address

Charlotte

City

704-651-4379

Telephone

Mecklenburg

County

NC

State

28211

Zip Code

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Herman &

Whiteaker, LLC, with offices at, at

6720-B Rockledge Drive, Suite 150

Street Address

Bethesda

City

202-827-0667

Telephone

Montgomery

County

MD

State

202-706-6056

Fax Number

20817

Zip Code

3. Applicant has been retained personally or as a member of the above named law firm by Sandhill Connexions, LLC to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.

4. Since January 6 of 1997, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of _____ where applicant regularly practices law. Attached is a certificate of good standing.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:

Date Admitted:

District of Columbia Court of Appeals	January 6, 1997
Supreme Court of the State of Florida	January 4, 1995

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below:
(List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

Correct

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

Correct

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

Correct

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

Correct

9. Local counsel of record associated with applicant in this case is Carrie L. DeVier, of the Herman & Whiteaker, LLC law firm, which has offices at:

1109 Trade Street
Street Address

Lexington

County

8034639379

Telephone

West Columbia

City

SC

State

29169

Zip Code

If applicable list all other firms/attorneys you are associated with in this matter

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

Yes, Applicant filed an application to appear pro hac vice in Sandhill Connexions, LLC Application of Sandhill Connexions, LLC for a Certificate of Public Convenience and Necessity to Provide Facilities-Based and Resold Local and Interexchange Voice Services, and for Alternative Regulation Pursuant to S.C. Code Ann. Sections 58-9-575 and 58-9-585 Within Certain Areas of the State of South Carolina, Docket No. 2016-311-C before the South Carolina Public Service Commission. The date of the Application was November 8, 2016, and the Application was granted. The Commission held an evidentiary hearing on November 14, 2016, and issued an Order on December 7, 2016. Local counsel on that Application was Carrie L. DeVier.

Applicant also filed an application to appear pro hac vice in South Carolina Net, Incorporated d/b/a Spirit Communications v. BellSouth Telecommunications, LLC d/b/a AT&T South Carolina, Docket No. 2016-79- C before the South Carolina Public Service Commission. The date of the Application was March 14, 2016, and the Application was granted. The Commission held an evidentiary hearing on May 19, 2016, and issued an Order on September 6, 2016. Local counsel on that Application was Carrie L. DeVier.

Applicant also filed an application to appear pro hac vice in South Carolina Telecommunications Group Holdings, LLC d/b/a Spirit Communications, Docket No. 2016-180-C, before the South Carolina Public Service Commission regarding a

request to grant an amendment of a Certificate of Public Convenience and Necessity ("CPCN"). The date of the Application was June 16, 2016. Applicant never received a date stamped copy of the application from the Supreme Court, but did receive a copy of the letter that the Supreme Court sent to the Commission notifying the Commission that the Court had received the application and fee. Because the CPCN amendment was granted by the Commission without a need for an evidentiary hearing, Applicant never filed a Motion for Admission Pro Hac Vice with the Commission. Local counsel on that Application was Carrie L. DeVier.

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 2nd day of February, 2021.

Robin E. Tuttle
APPLICANT

VERIFICATION

STATE OF North Carolina)

COUNTY OF Mecklenburg)

I, Robin E. Tuttle, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

Robin E. Tuttle
APPLICANT/AFFIANT

Subscribed and sworn to before me this 2nd day of February, 2021.

Cornelia C. Drake

Notary Public for the State of North Carolina

My Commission Expires: 3/22/2022



LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 4th day of February, 2021.

Cornelia C. Drake
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 4th day of February, 2021.

Cornelia C. Drake
APPLICANT/AFFIANT

STATE OF SOUTH CAROLINA)
)
COUNTY OF LEXINGTON) CERTIFICATE OF SERVICE

The undersigned, Carrie L. DeVier, hereby certifies that she is employed by the law firm of Herman & Whiteaker, LLC as attorneys for Sandhill Connexions, LLC and that she has caused the Motion for Admission Pro Hac Vice in Docket No. 2021-17-C to be served by United States Postal Service, first class postage prepaid and affixed thereto, and addressed to the following on March 8, 2021:

C. Lessie Hammonds
Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

Carri Grube Lybarker
Counsel
South Carolina Department of Consumer Affairs
Post Office Box 5757
Columbia, SC 29250

Roger P. Hall
Assistance Consumer Advocate
South Carolina Department of Consumer Affairs
Post Office Box 5757
Columbia, SC 29250

Jocelyn G. Boyd, Esquire
Chief Clerk
South Carolina Public Service Commission
101 Executive Center Drive
Suite 100
Columbia, South Carolina 29210



Carrie L. DeVier